

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

LEWIS M. IRVING,

Debtor.

Chapter 11

Case No. 19-13930-amc

**Objections Due: January 2, 2020  
Hearing Date: January 8, 2020 at  
11:00 a.m.**

**Hearing Location (if necessary):**

**Courtroom #4**

**Robert N.C. Nix Sr. Federal  
Courthouse, 900 Market Street,  
Philadelphia, Pennsylvania 19107**

**NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE**

PLEASE TAKE NOTICE THAT LSC19, LLC (“Lender”), as successor in interest to The Bancorp Bank, by and through its undersigned counsel, has filed *LSC19, LLC’s Motion for Entry of an Order Approving (I) the Disclosure Statement; (II) Procedures for the Solicitation and Tabulation of Votes to Accept or Reject LSC19, LLC’s Liquidating Plan; and (III) Related Notice and Objection Procedures* (the “Motion”).

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS AND CAREFULLY DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WITH TO CONSULT AN ATTORNEY).**

1. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, **then on or before January 2, 2020**, you or your attorney must do ALL of the following:

- A. File an answer explaining your position at

**UNITED STATES BANKRUPTCY COURT  
ROBERT N.C. NIX SR. FEDERAL COURTHOUSE  
900 MARKET STREET  
PHILADELPHIA, PENNSYLVANIA 19107**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

B. Mail a copy to counsel for the Lender:

**MICHAEL J. BARRIE  
KEVIN M. CAPUZZI  
JOHN C. GENTILE  
BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP  
1650 MARKET STREET, 36<sup>TH</sup> FLOOR  
PHILADELPHIA, PA 19103  
TELEPHONE: 302-442-7010  
FAX: 302-442-7012**

2. If you or your attorney do not take the steps described in paragraphs 1.A and 1.B above, the Court may enter an order granting the relief requested in the Motion without a hearing.

3. A hearing on the Motion, if necessary, will be held before the **HONORABLE ASHELY M. CHAN** on **January 8, 2020, at 11:00 a.m. (ET)**, in Courtroom #4, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, Pennsylvania 19107.

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1.B.

5. You may contact the bankruptcy clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

*[Remainder of Page Intentionally Left Blank]*

Dated: December 11, 2019

BENESCH, FRIEDLANDER, COPLAN  
& ARONOFF LLP

/s/ Michael J. Barrie

Michael J. Barrie (PA No. 85625)  
John C. Gentile (PA No. 322159)  
One Liberty Place  
1650 Market Street, 36th Floor  
Philadelphia, Pennsylvania 19103  
Telephone: (302) 442-7010  
Facsimile: (302) 442-7012  
Email: mbarrie@beneschlaw.com  
jgentile@beneschlaw.com

Kevin M. Capuzzi (*pro hac vice*)  
222 Delaware Avenue, Suite 801  
Wilmington, Delaware 19801-1611  
Telephone: (302) 442-7010  
Facsimile: (302) 442-7012  
Email: kcapuzzi@beneschlaw.com

*Counsel for LSC19, LLC*